

1 Yang, Kay-Xiong, beneficiary  
2 KAY XIONG YANG Estate and Trust  
3 c/o Poste Restante / General Post-Office  
4 c/o RR RFD C770 124 West Freistadt Road Suite 217  
5 Thiensville, Wisconsin Republic near 92(53092) – 9998  
6

U.S. DISTRICT COURT  
EASTERN DISTRICT OF WI  
FILED

2023 JUL 14 A 10:39

7 UNITED STATES DISTRICT COURT  
8 FOR THE EASTERN DISTRICT OF WISCONSIN

9  
10 Eastern District Of Wisconsin  
11  
12 MILWAUKEE DIVISION

23-C-094

Case No.

FILE PURSUANT TO 31 U.S.C § 3730(b)(1)

COMPLAINT FOR VIOLATIONS OF

HOBBS ACT 18 USC § 1951

FALSE CLAIMS ACT 31 U.S.C. §3729 – 3733

Racketeer Influenced & Corrupt

Organization Act “RICO”

18 U.S. CODE § 1961 - 1968

Freedom of Information Act “FOIA” 5 USC §552

the Fraud Enforcement and Recovery Act “FERA”

12 KAY XIONG YANG Estate and Trust  
13 Yang, Kay-Xiong, beneficiary  
14  
15 Plaintiffs,  
16 v.  
17 (Personal Capacities):  
18 Scott R. Halloin d/b/a SCOTT R. HALLOIN  
19 Sheila L. Shadman Emerson d/b/a SHEILA L.  
20 SHADMAN EMERSON  
21 Molly S. Fitzgerald d/b/a MOLLY S.  
22 FITZGERALD  
23 Long Lee d/b/a LONG LEE  
24 Miana Lee d/b/a MIANA LEE  
25 Kay Xiong d/b/a KAY XIONG  
26 David Blong Lee d/b/a DAVID BLONG LEE  
27 Mee Lee d/b/a MEE LEE  
28 Bee Xiong d/b/a BEE XIONG  
29 Pang Her d/b/a PANG HER  
30 Sandy A. Williams d/b/a SANDY A. WILLIAMS  
31 David L. Borowski d/b/a DAVID L. BOROWSKI  
32 Brandon Shayhorn d/b/a BRANDON SHAYHORN  
33 Dena Nardi d/b/a DENA NARDI  
34  
35 Defendants.  
36

Tort / Personal Injury Property Damage, Fraud/Other  
Violation of Private International Trust Property  
and invoking ‘Fee Schedule’ according to public  
notices against violation breeching private trust property  
Including but not limited to:  
Racial Profiling and discrimination

Malicious and Vexatious Prosecution

Defamation, Slander, Libel

Injunction Relief Requested  
JURY TRIAL DEMANDED

1 Relator: Kay-Xiong: Yang brings this action; pursuant to 31 USC §3729 et seq, this Complaint is to be filed in  
2 camera. This suit is not based on prior public disclosure of allegations or transactions in a criminal, administrative  
3 hearing or investigation in a Government Accountability Officer or Auditor General's report, hearing, audit,  
4 investigation or in the news media; or in any other location as the term "publicly disclosed" is defined in 31 U.S.C  
5 § 3730, but rather information from Plaintiff. In the alternative, to the extent there has been a public disclosure  
6 unknown to the Relator, she is an original source under the aforementioned statute. As more fully set forth in this  
7 Complaint, Relator, Kay-Xiong: Yang has direct and independent knowledge of the information on which the  
8 allegations herein are based, and witnessed directly the fraudulent actions and representations by the Defendants  
9 against the Relator (See Exhibits)

10  
11 This court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C § 1331 and 31 U.S.C § 3732,  
12 the latter of which specifically confers jurisdiction on this Court for actions brought pursuant to 31 U.S.C § 3729  
13 and 3730. Plaintiff establishes subject matter jurisdiction under 31 U.S.C § 3730(b). Under 31 U.S.S § 3730 €, there  
14 has been no statutorily relevant public disclosure of "allegations or transactions" in this Complaint for which  
15 Relator: Kay-Xiong: Yang is Not an "original source," additionally Defendants and each of them may be found in  
16 the District transact business in this District as set forth above. Venue is proper in this District Court pursuant to 28  
17 U.S.C. § 1391 and 31 U.S.C § 3732(a) because Defendants are found, transact business, and committed the acts  
18 alleged herein and proscribed by 31. U.S.C §3729 in this District. Defendant's actions in the categorization,  
19 underwriting and sale of securities to the Entities, to the United States or its departments or agents are continuous  
20 and systematic and substantially occurred or continue to occur in the Stat of Wisconsin.

21  
22 This action under the Hobbs Act, 18 USC § 1951 False Claims Act ("FCA"), the Racketeer Influenced and Corrupt  
23 organization Act ("RICO"), the Freedom of Information Act ("FOIA") 5 USC § 552, the Fraud Enforcement and  
24 Recovery Act ("FERA"), the American Recovery ad Reinvestment Act ("ARRA"), brought by Relator: Kay-Xiong:  
25 Yang to recover the treble damages and civil penalties under the Hobbs Act, 18 USC § 1951 False Claims Act, as  
26 amended, 31 U.S.C. §§ 3729 et seq. arising from fraud on the Court 18 USC § 1957, 8 USC § 1324c, the Generally  
27 Accepted Accounting Principles ("GAAP") 12 USC § 1831n, Tax Fraud, the Troubled Asset Relief Program  
28 ("TARP") 12 USC Chapter 52, collusion 18 USC § 371, conspiracy to defraud the United States 18 USC § 286 and  
29 its Citizens, racketeering 18 U.S.C §§ 1961-1968 and theft by deception 18 USC § 18 USC § 1028 in connection  
30 with Defendants personal business practices.

31  
32 The aforementioned Defendants have purposely collaborated to create Securities "vehicles" to exploit the ignorance  
33 of the American people concurrently utilizing those same vehicles to take advantage of trust and exploit loopholes  
34 and weaknesses of the established financial system. These white collar, Civil RICO racketeering collaborations  
35 were not accidents but maliciously manufactured and designed for exorbitant financial gain at the expense of its  
36 victims; with no care nor concern for the ramifications to the economy, economic system or persons they would

1 affect. Relator / Plaintiff: Kay-Xiong: Yang is a National who has first hand knowledge of the impact of the  
2 Defendants fraudulent actions as a victim of personal injury, unlawful detainment, kidnapping, trademark  
3 infringement, racial profiling and discrimination, defamation, slander and libel, violations of trespass onto  
4 international private trust property, vexatious and malicious prosecution and several count violations of the HOBBS,  
5 FALSE CLAIMS and RICO ACTS due to fraud upon the court.

6

7 The fraud on the court denies the public interest, thwarts the FOIA, transparency as the requested Court approval  
8 of settlements in which the Defendants resolve the serious allegations of fraud brought against them “without  
9 admitting or denying the allegations of the Complaint. “To this end, each of the proposed Consent Judgements now  
10 presented to this Court is accompanied by a formal written “Consent” of the defendant agreeing, pursuant to 17  
11 C.F.R § 205.5, “not to take any action or to make or permit to be made any public statement denying, directly or  
12 indirectly, any allegation in the complaint or creating the impression that the complaint is without factual basis.”  
13 “This might be defensible if all that were involved was a private dispute between private parties. But here an agency  
14 of the United States is saying, in effect, “Although we claim that these defendants have done terrible things, they  
15 refuse to admit it and we do not propose to prove it, but will simply resort to gagging their right to deny it.” The  
16 disservice to the public inherent in such a practice is palpable. Confronted with the same choice, the United States  
17 Department of Justice has long since rejected allowing defendants, except in the very most unusual circumstances,  
18 to enter into pleas of *nolo contendere*, by which a defendant accepts a guilty plea to a criminal charge without  
19 admitting or denying the allegations. See U.S. Dept of Justice, U.S. Attorney’s Manual § 9-16.010 (2008) (United  
20 States Attorneys may not consent to a plea of *nolo contendere* except in the most unusual circumstances any only  
21 after a recommendation for doing so has been approved by the Assistant Attorney General responsible for the subject  
22 matter or by the Associate Attorney General, Deputy Attorney General or the Attorney General.”); U.S. Depart of  
23 Justice, U.S. Attorney’s Manual § 9-27.500 (2006) (“The attorney for the government should oppose the acceptance  
24 of a plea of *nolo contendere* unless the Assistant Attorney General with supervisory responsibility over the subject  
25 matter concludes that the circumstances of the case are so unusual that acceptance of such plea would be in the  
26 public interest.”) As the great U.S. Attorney General Herbert Brownell, Jr. stated in a 1953 department directive:

27

28 [A] person permitted to plead *nolo contendere* admits his guilt for the purpose of imposing punishment for his acts  
29 and yet, for all other purposes, and as far as the public is concerned, persists in this denial of wrongdoing. It is no  
30 wonder that the public regards consent to such a plea by the Government as an admission that it has only a technical  
31 case at most and that the whole proceeding was just a fiasco.

32

33 See Comment, U.S. Dept of Justice, U.S. Attorney’s Manual § 9-27.500 (2006).

34

35 Moreover, as a practical matter, it appears that defendants who enter into consent judgement where they formally  
36 state, with the S.E.C’s full consent, that they neither admit or deny the allegations of the complaint, thereafter have

1 no difficulty getting the word out that they are still denying the allegations, notwithstanding their agreement not to  
2 "make any public statement" denying the allegations. Reacting to the equivocal press releases issued by some  
3 defendants after such settlements, S.E.C. Commissioner Luis A. Aguilar has expressed the "hope that this revisionist  
4 history in press release will be a relic of the past," but added "If not, it may be worth revisiting the Commission's  
5 practice of routinely acceding settlements from defendants who agree to sanctions "without admitting or denying"  
6 the misconduct." See Commissioner Luis A. Aguilar, Speech by SEC Commissioner: Setting Forth Aspirations for  
7 2011, Address to Practicing Law Institutes SEC Speaks in 2011 (Feb. 4, 2011)." These calculated well executed  
8 actions of serious fraud by the Defendants compounded by their fraud upon the courts; as they continue to falsify  
9 documents, make false claims, collect government funded insurance polices and if caught agree to terms with the  
10 governing agencies while never admitting guilt, hence they are able to continue to conduct business as usual;  
11 subsequently denying home owning American citizens their right to due process and justice all while making the  
12 Government and judiciary complicit and accomplices in the largest Human Trafficking and Securities fraud in the  
13 history of this great county. These same settlements and judgements thwart the very foundation and fabric of the  
14 FOIA, be denying full disclosure or establishing precedent, therefore society continues to be in the dark, people are  
15 continually loosing their liberties to a fraudulent racketeering machine.

16

## 17 AFFIDAVITS OF TRUTH AND FACT

18

19 Comes now, Yang, Kay-Xiong, as attorney in fact and trustee for the principals with beneficiaries known, the  
20 trustee is here to be availed, where are the securities to make the beneficiaries known? We do declare; the  
21 following as stated in the Affidavit of Truth and Fact and Pleadings in the Hobbs Act violations enumerated.

22

- 23 1. These claims involved the Plaintiff as beneficiary to several private trusts 15 U.S. Code § 1 and
- 24 2. The violations of various agent's involved" in an unrelated activity to which the Plaintiff was submitted  
25 unwittingly, resulting in her loss of liberty, 18 U.S.C section 1961 – 1968 sections 186, 201, 471, 472,  
26 473, 659, 1028, 1029, 1341, 1344, 1351, 1425, 1426, 1427, 1503, 1510, 1511, 1512, 1513, 1542, 1543,  
27 1544, 1546, 1581 – 1592, 1951, 1952, 1953, 1955, 1956, 1957, 2312, 2313, 2314, 2315, 2318, 2319,  
28 2320, 2421 – 2424,
- 29 3. Deprivation of rights, 18 U.S.C., Section 249 – Matthew Shepard and James Byrd, Jr. hate Crimes  
30 Prevention Act, 18 U.S.C., Section 241 – Conspiracy Against Rights, 18 U.S.C., Section 242 –  
31 Deprivation of Rights Under Color of Law, 18 U.S.C Section 245 – Federally Protected Activities, 18  
32 U.S.C 247 – Church Arson Prevention Act of 1996, 42 U.S.C., Section 3631 – Criminal Interference with  
33 Right to Fair Housing, 42, U.S.C Section 14141 – pattern and Practice,
- 34 4. Anti-Trust violations by all defendants. Plaintiff reserves all her rights and is seeking enforcement of the  
35 Trusts "Public Notices" through its "fee schedule". 15 U.S.C § 1051 et se. (THE LANHAM ACT)

36

5. It is the contention of the Plaintiff/beneficiary that this Organization is participating in RICO, HOBBS and FLASE CLAIMS Acts as well as others noted later in this Report. These and other violations may be currently under investigation by certain Federal Agencies of which this Claim is done concurrently. An informal and incomplete report of the Colluded Agents misinterpretation of events are to be included as evidence as well as the initial unenforceable “judgement” and final rulings are to be included in this case as well. Plaintiff/beneficiary is seeking damages enforceable and previously noticed Fee Schedule against Trust Property, Treble and Punitive Damages as well as expungement of the prior case information from the defendants mainframes. Finally, the Plaintiff/Beneficiary is seeking permanent injunction against the defendants from exercising any future malicious and/or vexatious prosecution against the Plaintiff/beneficiary.

## **SECURITIZATION, BONDING AND TAX FRAUD**

In the Court securitization process, collateralized securities are issued by, and receive payments from, cases collected in a collateralized debt obligation (CDO) pool, Investment Contract pool and similar Security products. The Investment Contract pool is treated as a trust. This trust is organized as a special purpose vehicle (“SPV”) and a qualified special purpose entity (“QSPE”) which receives special tax treatment. The SPV is organized by the securitizer so that the assets of the SPV are shielded from the creditors and principals of the securitizer and the parties who manage it. This shielding is described as making the assets “bankruptcy remote”. The non-Reporting or Mis-reporting of these Contracts, Securities are Tax avoidance and evasion activities.

## **THE HOBBS ACT (See Exhibit A)**

## THE FALSE CLAIMS ACT

The False Claims Act provides liability for any person (i) who “knowingly presents or causes to be presented, a false or fraudulent claim for payment or approval”; or (ii) who “knowingly makes, uses, or causes to be made or used, a false record or statement material to be false or fraudulent claim” 31 U.S.C. § 3729(a)(1)(A)-(B). The False Claims Act further provides that any person who violates the Act: “is liable to the United States Government for a civil penalty of not less than 100,000,000 and no more than \$3 billion including but not limited to, plus 3 times the amount of damages which the Government sustains because of the act of each Defendant person...” 31 U.S.C. § 3729(a); see 28 C.F.R. § 85.3(a)(9). Plus taxes to be reported and paid to the IRS.

## CAUSES OF ACTION:

## **FOR A FIRST CAUSE OF ACTION: CLAIM ONE.**

**AS TO ALL DEFENDANTS**

1 Tort / Personal Injury Property Damage, Fraud/Other: Plaintiff / beneficiary was first hand victim and  
2 witness to defendants actions, deprivation of rights, 18 U.S.C.. Section 249 – Matthew Shepard and James  
3 Byrd, Jr., Hate Crimes Prevention Act, 18 U.S.C., Section 241 – Conspiracy Against Rights, 18 U.S.C., Section  
4 242 – Deprivation of Rights Under Color of Law, 18 U.S.C., Section 245 – Federally Protected Activities, 18  
5 U.S.C., Section 247 – Church Arson Prevention act of 1996, 42 U.S.C. Section 14141 – Pattern and Practice  
6 as a result Plaintiff as sustained physical, emotional and mental injuries.

7

8 **FOR A SECOND CAUSE OF ACTION: CLAIM TWO.**

9 **AS TO ALL DEFENDANTS**

10

11 **DISCRIMINATION.** Defendants Willful Intent and Malicious Misconduct through the selective  
12 discrimination of Race, Creed, Color of Law against Plaintiffs' liberties and attempts to inform the  
13 Defendants of their unlawful activity against Plaintiff/beneficiaries Trust Property.

14

15 As a result, DEFENDANTS reported unjustly to government agencies and other regulatory agencies false  
16 activity in order to deter the Plaintiff/beneficiaries from filing proper claims that are in equity. This creates  
17 irreversible, irremediable and sustained damage to Plaintiff's/beneficiaries banking and commercial  
18 capability. (U.S. Code Title 18 Part I Chapter 13 § 241, 242, 243, 245, 245, 247, 249)

19

20 **FOR A THIRD CAUSE OF ACTION: CLAIM THREE.**

21 **AS TO ALL DEFENDANTS**

22

23 **UNJUST ENRICHMENT and TRUST INFRINGEMENT (RICO).** Specially the selling and usufruct of the  
24 KAY XIONG YANG©™ ESTATE, TRUST and KAY XIONG YANG©™ private property as registered,  
25 copyrighted and Trademarked signatures. By fraudulently investing the aforementioned pooled private  
26 securities into an investment fund similar to the CRIS (Court Registry Investment System) and failure to  
27 disclose the investment contracts, vehicles and/or conduits entitled to Plaintiffs/beneficiaries as "Original  
28 Issuer" (principal), along with the U.S. Government's Justice Department who has a vested Security Interest  
29 in the Plaintiff/beneficiaries Private Property, the DEFENDANTS procured a Fraudulent Security Interest  
30 in the primary property. (See list) (U.S. Code Title 18 part I Chapter 113 §2320)

31

32 **FOR A FOURTH CAUSE OF ACTION: CLAIM FOUR.**

33 **AS TO ALL DEFENDANTS**

34

35 **HOBBS ACT, FALSE CLAIMS ACT, FRAUD through ROBBERY and EXTORTION.** Plaintiff/beneficiary  
36 declared that she was signatory to sf312(non-disclosure) and sf61 (appointment affidavits), offering initial

1 protection against the espionage acts that the Defendants were 'attempting' to violate against the National  
2 Currency Act 1863 sect 27, 28 and National Banking Acts of 1864 and are in breach of their Fiduciary duty.  
3 HOBBS ACT Violations occurred. The Defendant's failed to perform according to International UCC  
4 Standards Article 9. (U.S. Code Title 18 Part I Chapter 96 § 1962) as a Fiduciary relationship was created on  
5 behalf of the Defendant, of which they breached and failed to report the Taxes on these account(s)/case(s).  
6 No 1099OID was extended or any Tax documentation upon the closure of these Account(s)/Case(s),  
7 consequently these accounts remain open and are routinely used to retry and charge account(s)/case(s) on  
8 older subjects, the community and foreigners alike. Both local reporting and in house reporting continues  
9 and no tax reporting is carried out. Failure to release title, documents and other trust property and  
10 subsequently reconvey these upon honorable settlement in full of unverified debts. The material facts are  
11 that Plaintiff was and is the beneficiary, grantor, creditor and that the Defendant(s) risked none of their assts.  
12 Defendant(s) violated 18 U.S.C. § 1951, 31 U.S.C. § 3729(a)(I)(A)-(B) through 31 U.S.C. § 3738 by failing or  
13 refusing to disclose this material fact.

14

15 **FOR A FIFTH CAUSE OF ACTION: CLAIM FIVE.**  
16 **AS TO ALL DEFENDANTS**

17

18 **DEFAMATION.** The Defendant's have used and continue to utilize U.S., State Government Property and  
19 Plaintiff's name: KAY XIONG YANG©™ private banking information, Government Certificates and  
20 Guarantees to cause defamation, slander and libel for the deterring of this suit in an attempt to criminalize  
21 and defame the Plaintiff/beneficiary. The DEFENDANTS committed various Tort actions in violation of  
22 Federal antitrust laws. DEFENDANTS created misleading statements and used diversionary tactics upon  
23 plaintiff's private property. Namely, calling ex-Family members, friends and other 3<sup>rd</sup> Party individuals and  
24 entities not a party to the matter. By attempting to collect or gather further private information, the  
25 DEFENDANTS created further and sustained injury against the good name of the Plaintiff's Trust, Estate  
26 and her property. 18 U.S.C. § 1951, 31 U.S.C § 3729(a)(I)(A)-(B), 18 U.S.C section 1961-1968 section 186, 201,  
27 471, 472, 473, 659, 1028, 1029, 1341, 1344, 1351, 1425, 1426, 1427, 1503, 1510, 1511, 1512, 1513, 1542, 1543,  
28 1544, 1546, 1581 – 1592, 1951, 1952, 1953, 1955, 1956, 1957, 2312, 2313, 2314, 2315, 2318, 2319, 2320, 2421 –  
29 2424 all inclusive.

30

31 **FOR A SIXTH CAUSE OF ACTION: CLAIM SIX**  
32 **AS TO ALL DEFENDANTS**

33

34 **PERSONAL INJURY, LIBEL, VIOLATION OF TRUST DOCUMENTATION INCLUDING**  
35 **DESTRUCTION OF PRIVIATE U.S. SECURITIES (ANTI-TRUST ACTS).** The Defendant's use Plaintiff's  
36 name: KAY XIONG YANG©™ private insurance information to cause defamation, slander and libel for the

1 deterring of this suit is an attempt to criminalize and defame the Plaintiff's by calling the Plaintiff's personal  
2 and former familial contracts so as to defame the Character of the "Plaintiff/beneficiary". Destruction of  
3 U.S. and private Trust Securities have been used as a retaliatory medium so as to erase, remove and steal  
4 evidence of Political standing which contrary to the personal beliefs of the Defendants. Specific Causes to be  
5 determined by a Full Accounting by the IRS, the United States and Plaintiff/beneficiaries. Destruction, Theft,  
6 or Removal of a public record or document is prohibited by 18 U.S.C. § 641, 18 U.S.C. § 1361. Protection for  
7 government documents and records is provided by 18 U.S.C. § 2071. Section 2071(a), United States v.  
8 Simpson, 460 F.2d 515, 518 (9<sup>th</sup> Cir 1972), United states v. DeGroat, 30 F. 764, 765 (E.D.Mich. 1887), 18 U.S.C.  
9 § 2071(a), United States v. Rosner, 352 F. Supp. 915, 919-22 (S.D.N.Y 1972), Title 18 U.S.C. Section 285 and  
10 Section 1506.

11

12 **FOR A SEVENTH CAUSE OF ACTION: CLAIM SEVEN**  
13 **AS TO ALL DEFENDANTS**

14

15 **INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS AND TORTURE. RACIAL PROFILING**  
16 **AND PERSECUTION:** Defendant's against or assigns hired certain individual as agents and or assigns to  
17 perform criminal activity to trespass coerce and threaten Plaintiff/beneficiary KAY XIONG YANG©™  
18 ESTATE and TRUST, their members and Family/Beneficiaries. Defendants Willful Trespass upon  
19 Plaintiffs/beneficiaries Dwelling and private conveyance caused damage and Injury to Plaintiffs/beneficiaries  
20 estate and trust by the use of a false fraudulent exercise.

21

22 **FOR A EIGHTH CAUSE OF ACTION: CLAIM EIGHT.**  
23 **AS TO ALL DEFENDANTS**

24

25 **PERSONAL INJURY THROUGH VIOLATION OF PRIVIATE TRUST FEE SCHEDULE.** Defendants,  
26 knowingly, willingly and with full intent and knowledge, performed multiple almost uncountable violations  
27 against a previously filed, recorded and publicly notified Trust 'fee schedule'. The specific Violations, Counts  
28 and Relief requested is presently being assessed by private accounting assessment and by the overseeing of  
29 the IRS fiscal Authority, exact amounts and counts to be followed.

30

31 **FOR A NINTH CAUSE OF ACTION: CLAIM NINE**  
32 **AS TO ALL DEFENDANTS**

33

34 **FRAUD AND RACKETEERING (RICO).** All these parties are in collusion in using the U.S. Mails and Wire  
35 Services to collect on these unlawful debts in violation of 18 U.S.C. 1341 (mail fraud) and 18 U.S.C. (wire  
36 fraud) and 19 U.S.C. 1962 in establishing a "pattern of racketeering activity". Plaintiff/beneficiaries ask for

1 triple damages for actual and compensatory damages sustained pursuant to 18 U.S.C 1964 from each and  
2 every defendant on all counts.

3

4 **FOR A TENTH CAUSE OF ACTION: CLAIM TEN.**

5 **AS TO ALL DEFENDANTS**

6

7 **USURY AND RACKETEERING (RICO).** By virtue of “Official Office” operations, Defendants, persecute  
8 and prosecute unwitting innocent individuals and groups into creating False Bonds and Securities in order  
9 to profit privately through dummy corporations and create a false sense of Justice for ‘All’, Namely private  
10 interest. Defendants purposely block and eliminate the referring of these cases to the Federal Instance namely  
11 the Department of Justice whom is empowered to adjudicate these cases competently.

12

13 **REMEDY and RELIEF**

14

15 Plaintiff does seek and Demand remedy and relief for statutory, treble, punitive and personal damages for Injury,  
16 Damage and monetary compensation in amount equal to prior claims. Plaintiff seeks recoupment of loss, injury  
17 and damages in the form of a Permanent Injunction against the DEFENDANTS, the releasing of Title of  
18 aforementioned property, an entry of a summary judgement on the Pleadings of Null and Void due to Fraud, deceit  
19 and willful intent to obstruct justice.

20

21 **RELIEF REQUESTED**

22

23 **1. ON THE FIRST CAUSE OF ACTION: CLAIM ONE**

24 The Plaintiff/beneficiaries ask the court to empanel a Grand Jury to try Defendants their against and or  
25 assigns including any Third party DEFENDANTS for violation of Federal Antitrust laws and the Federal  
26 Racketeering laws including 18 U.S.C 1341 (mail fraud) and 18 U.S.C 1343 (wire fraud) and 18 U.S.C  
27 1962 (patterns of racketeering activity and 18 U.S.C. 241 for conspiracy to violate the plaintiffs'  
28 Constitutionally protected rights. Relief requested is the production of the fraudulent Cases created for  
29 profit and kickbacks to Defendants through obscure Entities. 15 U.S. Code § 1 and 18 U.S.C section 1961-  
30 1968 section 186, 201, 471, 472, 473, 659, 1028, 1029, 1341, 1344, 1351, 1425, 1426, 1427, 1503, 1510,  
31 1511, 1512, 1513, 1542, 1543, 1544, 1546, 1581 – 1592, 1951, 1952, 1953, 1955, 1956, 1957, 2312, 2313,  
32 2315, 2318, 2319, 2320, 2421 – 2424. To be determined by the Statutory Violations through an empaneled  
33 Jury and through the Combined accounting of the aforementioned Trust ‘Fee Schedule’ by the IRS and  
34 Private Accounting as well as an empanel Jury.

35 **2. ON THE SECOND CAUSE OF ACTION: CLAIM TWO.**

1 DEFAMATION OF CHARACTER AND USURY OF PUBLIC AND PRIVATE ESTATE AND TRUST  
2 DOCUMENTS, (American National / Non-resident Alien). Reference: James C. TREZEVANT, Plaintiff-  
3 Appellant v. CITY OF TAMPA, a municipal corporation, et al., Defendants-Appellees. James C.  
4 TREZEVANT, Plaintiff-Appellee, v. CITY OF TAMPA, a municipal corporation, Hillsborough County  
5 Board of Criminal Justice, et al., Defendants –Appellants Preliminary Accounting as follows but not limited  
6 to: TREZEVANT CASE: 25,000 = 23 minutes = 1,086.95652173913 per minute per occurrence and per  
7 each Defendant not including punitive, treble and Tax Costs for Recoupment and Tax Liabilities of  
8 Defendants per Title 26 IRC Manual, IRS, and U.S. Government assessment of all their claims.

9 **3. ON THE THIRD CAUSE OF ACTION: CLAIM THREE.**

10 Plaintiff asks for an Evidentiary hearing and Demands a Trial by Grand Jury to be comprised of 12 members  
11 to determine all issues of facts in dispute and to determine award of all damages. In the Alternative  
12 \$5,000,000 per Trademark Violations through each occurrence and usage per individual violate. Plus a  
13 preliminary accounting in Relief of: James C. TREZEVANT, Plaintiff-Appellant v.s CITY OF TAMPA, a  
14 municipal corporation, et al., Defendants-Appellees. James C. TREZEVANT, Plaintiff-Appellee, v. CITY  
15 OF TAMPA, a municipal corporation, Hillsborough County Board of Criminal Justice, et al., Defendants –  
16 Appellants. Preliminary Accounting as follows but not limited to: TREZEVANT CASE: 25,000 = 23  
17 minutes = 1,086.95652173913 per minute per occurrence and per each Defendant not including punitive,  
18 treble and Tax Costs for recoupment and Tax Liabilities of Defendants per title 26 IRC Manual, IRS. Not  
19 limited to Claims of Anti-Trust ‘Fee Schedule’ to be determined.

20 **4. ON THE FOURTH CAUSE OF ACTION: CLAIM FOUR.**

21 Plaintiff asks for a court order declaring the alleged cases and security agreements and any allied  
22 documentation and evidence including a subpoena of all Voice Recording, Copies and Video Data to be  
23 adjudicated and assessed by the taxing authority (IRS) and that all references to any Cases be expunged and  
24 remove from all STATE OF WISCONSIN mainframes to be null and void. Additionally, Plaintiff asks the  
25 court to demand the production of the MoneyNet Transaction reports on this and other Related Accounts.  
26 The ‘CALL REPORTS’ from all Banking Institutions involved upon all Related Accounts and a Financial  
27 Monetary Audit from the “District Comptroller” on all Related Accounts and the including of the  
28 aforementioned ‘Office’ as additional Interested. Reference: James C. TREZEVANT, Plaintiff-Appellant v.  
29 CITY OF TAMPA, a municipal corporation, et al., Defendant-Appellees. James C. TREZEVANT, Plaintiff-  
30 Appellee, v. CITY OF TAMPA, a municipal corporation, Hillsborough County Board of Criminal Justice,  
31 et al., Defendants-Appellants. Preliminary Accounting as follows by not limited to: TREZEVANT CASE:  
32 25,000 = 23 minutes = 1,086.95652173913 per minute per occurrence and per each Defendant not including  
33 punitive treble and Tax Costs for Recoupment and Tax Liabilities of Defendants per Title 26 IRC Manual,  
34 IRS, and U.S. Government assessment of all their claims.

35  
36 **5. ON THE FIFTH CAUSE OF ACTION: CLAIM FIVE.**

1 A permanent injunction and temporary restraining order against the Defendants, their agents and or assigns  
2 to divest themselves of any assets they have unlawfully gained and to return the same to the  
3 plaintiff/beneficiary as the injured party. Additionally, the removal of any derogatory insertions in Public  
4 Venue and Apologize for statements, through libel and slander be removed from all sources affected such  
5 as credit reports, administrative reports or statements which caused pain and injury to the  
6 Plaintiff/beneficiaries financial wellbeing. In the Alternative a \$10,000,000 per occurrence per usage of the  
7 name in the private venues. Additional but not limited to: James C. TREZEVANT, Plaintiff-Appellant v.  
8 CITY OF TAMPA, a municipal corporation, et al., Defendant-Appellees. James C. TREZEVANT, Plaintiff-  
9 Appellee, v. CITY OF TAMPA, a municipal corporation, Hillsborough County Board of Criminal Justice,  
10 et al., Defendants-Appellants. Preliminary Accounting as follows by not limited to: TREZEVANT CASE:  
11 25,000 = 23 minutes = 1,086.9562173913 per minute per occurrence and per each Defendant not including  
12 punitive treble and Tax Costs for Recoupment and Tax Liabilities of Defendants per Title 26 IRC Manual,  
13 IRS, and U.S. Government assessment of all their claims.

14 **6. ON THE SIXTH CAUSE OF ACTION: CLAIM SIX.**

15 A Formal "True Bill" is to be Issued against the Defendants and in Favor of the Plaintiff/beneficiaries:  
16 'This is a TRUE BILL in Equity for charges to be placed upon the Defendant and upon verified 'TORT'  
17 claims of "Wrongful Arrest", "Wrongful and Fraudulent Seizure of the Trust and Estate Property", "Identity  
18 Theft", Breach of Peace", "Racial Profiling and Specific persecution", "Defamation of Character" and  
19 "Trespass upon Estate and Trusts, Trust Properties", "Trusts and Infringements" among others to be  
20 enumerated within this Bill.' \$3,000,000,000 for personal and punitive damages per claim per occurrences  
21 per violation as stipulated in Title 18 references above.

22 **7. ON THE SEVENTH CAUSE OF ACTION: CLAIM SEVEN.**

23 \$500,0000 per loss per individual as caused by distress and suffering due to DEFENDANTS Tortuous Acts  
24 committed and prays for all costs to be Granted as recoupment of suffrage and loss per individual whom is  
25 found culpable. In addition: James C. TREZEVANT, Plaintiff-Appellant v. CITY OF TAMPA, a municipal  
26 corporation, et al., Defendant-Appellees. James C. TREZEVANT, Plaintiff-Appellee, v. CITY OF TAMPA,  
27 a municipal corporation, Hillsborough County Board of Criminal Justice, et al., Defendants-Appellants.  
28 Preliminary Accounting as follows by not limited to: TREZEVANT CASE: 25,000 = 23 minutes =  
29 1,086.9562173913 per minute per occurrence and per each Defendant not including punitive treble and Tax  
30 Costs for Recoupment and Tax Liabilities of Defendants per Title 26 IRC Manual, IRS, and U.S.  
31 Government assessment of all their claims.

32 **8. ON THE EIGTH CAUSE OF ACTION: CLAIM EIGHT.**

33 Defendants, Executed a trust fee schedule by obtaining a Trustee relationship and effected a Tax  
34 Accountable Event through: Plaintiff/beneficiary/claimant prays for relief pursuant to, but not limited to:  
35 James C. TREZEVANT, Plaintiff-Appellant v. CITY OF TAMPA, a municipal corporation, et al.,  
36 Defendant-Appellees. James C. TREZEVANT, Plaintiff-Appellee, v. CITY OF TAMPA, a municipal

1 corporation, Hillsborough County Board of Criminal Justice, et al., Defendants-Appellants. Preliminary  
2 Accounting as follows by not limited to: TREZEVANT CASE: 25,000 = 23 minutes = 1,086.9562173913  
3 per minute per occurrence and per each Defendant not including punitive treble and Tax Costs for  
4 Recoupment and Tax Liabilities of Defendants per Title 26 IRC Manual, IRS, and U.S. Government  
5 assessment of all their claims.

6 **9. ON THE NINTH CAUSE OF ACTION: CLAIM NINE.**

7 Third Party DEFENDANTS will be added to this instant matter as 3<sup>rd</sup> party interlopers and if not  
8 Demonstrated that they have complied with WISCONSIN BUSINESS AND PROFESSIONS CODE. Their  
9 Oath. Plaintiff will move to Disqualify / Attorneys / Counsel and subsequent counsel. If performed against  
10 a Federally protected witness and whistleblower protection acts the following will ensue: James C.  
11 TREZEVANT, Plaintiff-Appellant v. CITY OF TAMPA, a municipal corporation, et al., Defendant-  
12 Appellees. James C. TREZEVANT, Plaintiff-Appellee, v. CITY OF TAMPA, a municipal corporation,  
13 Hillsborough County Board of Criminal Justice, et al., Defendants-Appellants. Preliminary Accounting as  
14 follows by not limited to: TREZEVANT CASE: 25,000 = 23 minutes = 1,086.9562173913 per minute per  
15 occurrence and per each Defendant not including punitive treble and Tax Costs for Recoupment and Tax  
16 Liabilities of Defendants per Title 26 IRC Manual, IRS, and U.S. Government assessment of all their claims.  
17

18 **FOUNDATIONAL BASIS**

19 Every person on this admission shall take an oath to support the Constitution of the United States  
20 and the Constitution of the State of Wisconsin, and faithfully discharge the duties of any attorney at law to  
21 the best of his knowledge and ability.

22 **A certificate of Oath shall be endorsed upon their license.**

23 (Added by Stats. 1939, c 34. P. 354, Sec. 1.)

24 Note: The Constitution of the State of Wisconsin (and likely other states), Article XX, Section 3,  
25 requires that an attorneys license, in order to be valid, be issued by the State of Wisconsin. The Wisconsin  
26 Business and Professions Code, “B&P” § § 440 and 480 requires “a certificate of the oath” to be endorsed  
27 upon “the license of a practicing attorney”. However, no attorney has any such state-issued “license to  
28 practice law” – only a Bar Card which is evidence only of active membership (dues are current) in a foreign-  
29 owned, private union, the bar association. There are no attorneys licensed in Wisconsin. When asked, none  
30 can produce a certificate. At best, an attorney can only produce his/her Bar membership card (privately  
31 issued by Bar Association) and a letter of acknowledgement from the state supreme court. The Wisconsin  
32 Bar Association was incorporated in Jan. 9, 1878.

33 The Bar Association now does not officially exist in Wisconsin. It operates as a chapter of the  
34 national organization, probably as a common law association. The Wisconsin Secretary of State does not  
35 have any record of the Association. Any corporation is required to register with the Secretary of State, even  
36 municipal and non-profit corporations. The Association has not done so.

1 Plaintiff hereby disqualifies any opposing counsel' and/or attorneys present or subsequent until  
2 these requirements are met and Defendants Attorney(s) are hereby added to the Default Claims of Record  
3 as Judgement Debtors along with their clients as they enjoined the Claim through "Notice of Principle is  
4 notice to Agents and Notice to Agents is Notice to Principle."

5 Furthermore, any presumption of the Defendants / Counsel / Attorneys alleged right to determine  
6 facts preceding trial over the Plaintiffs Will and Constitutionally protected Rights are hereby nullified as is  
7 expressed in the various exhibits including but not limited to the COL Letters and Administrative Claims  
8 as to the illicit usage of an Estate, Trust and Federally Protected Title. Additionally there is no evidence of  
9 an IRS Form 56 filing (Appointment of Fiduciary) or 'Notice of Nominee' over the Plaintiffs Estate, Trust  
10 or any other property of the Plaintiff by the Defendants, their alleged counsel and 3<sup>rd</sup> Party Defendants.

11 Conclusively if any of these presumption exist: Defendants, are hereby Fired by all assumptive and  
12 presumptive Activities against the Plaintiff/beneficiaries trust and estate. Or in the alternative  
13 recuse/withdraw themselves of this case or in the alternative: James C. TREZEVANT, Plaintiff-Appellant  
14 v. CITY OF TAMPA, a municipal corporation, et al., Defendants-Appellees. James C. TREZEVANT,  
15 Plaintiff-Appellee, v. CITY OF TAMPA, a municipal corporation, Hillsborough County Board of Criminal  
16 Justice, et al., Defendants-Appellants.

17 Preliminary Account as follows but not limited to per occurrences and per each Defendant not  
18 including punitive, treble and Tax Costs for Recoupment and Tax Liabilities of Defendants per Title 26 IRC  
19 Manual, IRS and US Government assessment of all their claims.

20 **10. ON THE TENTH CAUSE OF ACTION: CLAIM TEN.**

21 Pursuant to the statement in the initial pleading, "REQUEST FOR RELIEF"

22 Relief is defined as: Plaintiff/beneficiary seeks a Declaratory Judgement based on the findings and Facts  
23 contained herein. To be determined via: James C. TREZEVANT, Plaintiff-Appellant v. CITY OF TAMPA,  
24 a municipal corporation, et al., Defendant-Appellees. James C. TREZEVANT, Plaintiff-Appellee, v. CITY  
25 OF TAMPA, a municipal corporation, Hillsborough County Board of Criminal Justice, et al., Defendants-  
26 Appellants. Preliminary Accounting as follows by not limited to: TREZEVANT CASE: 25,000 = 23  
27 minutes = 1,086.9562173913 per minute per occurrence and per each Defendant not including punitive  
28 treble and Tax Costs for Recoupment and Tax Liabilities of Defendants per Title 26 IRC Manual, IRS, and  
29 U.S. Government assessment of all their claims. Plaintiff hereby requests a grand jury trial on all issues  
30 raised in this complaint. Plaintiff/beneficiary requests that the Trust "fee schedule" be entered into evidence.

31  
32 **PRAYER**

33  
34 **Plaintiff/beneficiary Prays for relief in the preliminary Amount of 3 Billion U.S. Dollars in Pre-1964 Coin**  
35 **Value Silver and God.**

1 Wherefore, the Relator / Plaintiff / beneficiary respectfully request that judgement be entered in favor and against  
2 all Defendants as follows:

- 4 1. That defendants cease and desist from violating 31 U.S.C. § 3729 et seq.;
- 5 2. That Court enters judgements against the defendants in an amount equal to three times the amount of  
6 damages the Plaintiff has sustained due to the negligent actions of the Defendants, plus a civil penalty of  
7 not less than \$3 million and not more than \$3 billion for each violation of 31 U.S.C. § 3729; 31 USC. §  
8 3730 (d); et seq.;
- 9 3. That Relator be awarded the maximum amount allowed pursuant to 31 USC. § 3730(d) of the False claims  
10 Act; 18 USC. § 1951 of the Hobbs Act; et seq.;
- 11 4. That Relator be awarded all costs of this action, including attorney's fees, cost and expense pursuant to 31  
12 U.S.C. § 3730(d); and et seq.;
- 13 5. That the Court acknowledges and enters into the evidence the Trusts "Fee Schedule" as a basis for the fiscal  
14 accounting as per IRS Title 26 and impose the forthcoming fee along with the Tax Assessed for this  
15 Account/Case No. and et seq.;
- 16 6. That the Relator / Plaintiff be granted all such relief as the court deems just and proper.

17  
18 Confirmation of Affidavits;

19 Dated 14<sup>th</sup> day of July, 2023 A.D.

20  
21 /s/ Kay-Xiong: Yang

22 KAY XIONG YANG Estate and Trust  
23 c/o Post Restante / General Post-Office  
24 c/o RR RFD C770 124 Freistadt Road Suite 217  
25 Thiensville, Wisconsin Republic near 92(53092) – 9998  
26 Title 15 INTERNAL REVENUE

27  
28 Respectfully submitted,

29 By: \_\_\_\_\_

30 :Kay-Xiong: Yang  
31  
32 Relator / Plaintiff

1  
2  
3  
4 I certify that on this 14<sup>th</sup> day of July, 2023 A.D., a woman who is known to be to be Kay-Xiong: Yang, appeared to  
5 attest and affirm that she is the woman executing the forgoing Affidavit of Common law and aforementioned  
6 Motions and Notices.

7  
8 **NOTARY ACKNOWLEDGEMENT**  
9

10 STATE OF Wisconsin

11 Milwaukee County

12  
13 Sworn to (or affirmed) and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, 2023,

14  
15 By \_\_\_\_\_ :: \_\_\_\_\_

16  
17 Signature \_\_\_\_\_, Notary public *Seal*

18  
19 My Commission Exp: \_\_\_\_\_

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## **AFFIDAVIT OF TRUTH**

Comes now, Kay-Xiong: Yang, Your Affiants, being competent to testify and being over the age of 21 years of age, after first being duly sworn under penalty of perjury to tell the truth to the facts related herein states the she has firsthand knowledge of the facts stated herein and believes these facts to be true to the best of her knowledge.

For the purpose of this Affidavit of Truth, "I", "Me", "Claimant", being used in reference to Affiant and "Kay-Xiong: Yang".

For the purpose of this Affidavit of Truth, "You", "Your", "Agent/s", "Principal/s", "Respondents", are being used in reference to, but not limited to Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE and HALLOIN LAW GROUP, S.C.

1. I, Kay-Xiong: Yang, am over the age of 18. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto,
2. I, Kay-Xiong: Yang, suffer no legal disabilities and have personal knowledge of the facts set forth below,
3. I, Kay-Xiong: Yang, a divine, living woman, am the authorized representative for the KAY X YANG, Estate and Trust,
4. I, Kay-Xiong: Yang, do not have any personal or business relationship with Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE and HALLOIN LAW GROUP, S.C.,
5. I, Kay-Xiong: Yang, do not have a verbal or written covenant, legal or lawful contract or agreement with Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE and HALLOIN LAW GROUP, S.C.,
6. I, Kay-Xiong: Yang have never received any lawful money from Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE and HALLOIN LAW GROUP, S.C.,
7. I, Kay-Xiong: Yang have never received anything of valuable consideration from Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN EMERSON, Molly S. Fitzgerald,

1 MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA LEE, Kay Xiong, UNLIMITED  
2 WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE and HALLOIN LAW GROUP,  
3 S.C.,

4 8. I, Kay-Xiong: Yang attest that Miana Lee, Long Lee, Blong Lee, Mee Lee and Kay Xiong came to the  
5 property 9855 West Hawthorne Road, city of Mequon, state of Wisconsin to ask me, Kay-Xiong: Yang to  
6 help them enter into a contract with a Delaware company call Xapphire LLC / Xapphire Fund, LLC,  
7 9. I, Kay-Xiong: Yang attest that Miana Lee, Long Lee, Blong Lee, Mee Lee and Kay Xiong are all college  
8 graduates, professionals who are competent, can read and write and have no disabilities,  
9 10. I, Kay-Xiong: Yang was requested by Miana Lee, Long Lee, Blong Lee, BLONG LEE, Mee Lee, and Kay  
10 Xiong for a copy of the prospectus and offering of Xapphire LLC and Xapphire Fund, LCC,  
11 11. I, Kay-Xiong: Yang gave a copy via email and in person of the Xapphire LLC / Xapphire Fund, LLC  
12 prospectus and offering document to Miana Lee, Long Lee, Blong Lee, Mee Lee and Kay Xiong,  
13 12. Miana Lee, MIANA LEE, Long Lee, LONG LEE, Blong Lee, BLONG LEE, Mee Lee, MEE LEE,  
14 UNLIMITED WEALTH, LLC, and Kay Xiong signed and accepted an offering, in their own free will, with  
15 Xapphire LLC and Xapphire Fund, LLC, Delaware companies,  
16 13. I, Kay-Xiong: Yang have never solicited to Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman  
17 Emerson, SHEILA L. SHADMAN EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long  
18 Lee, LONG LEE, Miana Lee, MIANA LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee,  
19 DAVID BLONG, Mee Lee, MEE LEE and HALLOIN LAW GROUP, S.C.,  
20 14. I, Kay-Xiong: Yang conduct all my personal and businesses in the private and do not solicit to anyone,  
21 15. I, Kay-Xiong: Yang have responded to every communication that Scott R. Halloin, SCOTT R. HALLOIN,  
22 Sheila L. Shadman Emerson, SHEILA L. SHADMAN EMERSON, Molly S. Fitzgerald, MOLLY S.  
23 FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA LEE, Kay Xiong, UNLIMITED WEALTH,  
24 LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE and HALLOIN LAW GROUP, S.C. have  
25 sent to me and have stayed in honor since the beginning of their complaints,  
26 16. At no time did Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L.  
27 SHADMAN EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana  
28 Lee, MIANA LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee  
29 Lee, MEE LEE and HALLOIN LAW GROUP, S.C. provided proof of claim to their complaints,  
30 17. Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN  
31 EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA  
32 LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE  
33 and HALLOIN LAW GROUP, S.C. has been harassing me and my family since May of 2022,  
34 18. Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN  
35 EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA  
36 LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE

1 and HALLOIN LAW GROUP, S.C. has caused me and my family financial injury,

2 19. Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN  
3 EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA  
4 LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE  
5 and HALLOIN LAW GROUP, S.C. has filed more than 12 cases against me and my family in various  
6 counties,

7 20. Scott R. Halloin, SCOTT R. HALLOIN, Sheila L. Shadman Emerson, SHEILA L. SHADMAN  
8 EMERSON, Molly S. Fitzgerald, MOLLY S. FITZGERALD, Long Lee, LONG LEE, Miana Lee, MIANA  
9 LEE, Kay Xiong, UNLIMITED WEALTH, LLC, David Blong Lee, DAVID BLONG, Mee Lee, MEE LEE  
10 and HALLOIN LAW GROUP, S.C. has committed mail fraud by sending fraudulent documents to me even  
11 after notifying them of my fee schedule and trademark,

12 21. On June 12, 2023, I, Kay-Xiong: Yang attended a court hearing in Ozaukee County and Sandy A. Williams  
13 muted me, demanded the bailiff to remove me immediately; I was muted and was removed,

14 22. On June 27, 2023, I, Kay-Xiong: Yang attended a court hearing in Ozaukee County and Sandy A. Williams  
15 muted me, demanded the bailiff to remove me immediately; I was muted and was removed,

16 23. Sandy A. Williams barred me from filing any documents into the court cases,

17 24. On July 12, 2023, I, Kay-Xiong: Yang attended a court hearing in Milwaukee County Clerk of Circuit Count  
18 and David Borowski muted me, demanded the bailiff to remove me immediately; I was muted and was  
19 arrested by Brandon Shayhorn who cited none other than disorderly conduct,

20 25. On July 12, 2023, I, Kay-Xiong: Yang gently placed the documents I needed to file on a chair and request  
21 the documents be filed, stated for the record that there were no such thing as a “licensed” attorney and left  
22 the room,

23 26. I, Kay-Xiong: Yang was immediately ordered by David Borowski to Brandon Shayhorn to be arrested and  
24 detained for more than 12 hours,

25 27. David Borowski also barred me from filing any documents into the Milwaukee cases,

26 28. On July 14, 2023, I, Kay-Xiong: Yang send certified mail this affidavit of truth under penalty of perjury.

27

28 I declare that, to the best of my knowledge and belief, the information herein is true, correct, and complete.

29

30 Executed the Fourteenth day of the seventh month in the year or our Lord, twenty twenty-three.

31

32 By: \_\_\_\_\_

33 :Kay-Xiong: Yang  
34 Relator / Plaintiff  
35  
36

## NOTARY ACKNOWLEDGEMENT

State of Wisconsin )

) ss.

## County of Milwaukee

7 On this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, for the purpose of verification, I, the undersigned Notary  
8 Public, being commissioned in the County and State noted above, do certify that  
9 \_\_\_\_\_ appeared before me with the following documents and signed the  
10 documents before me, \_\_\_\_\_, Notary Public.

WITNESS my hand and official seal.

Seal

NOTARY PUBLIC Signature

My commission expires